

**UNITED STATES COURT OF APPEALS
FOR THE
DISTRICT OF COLUMBIA**

HILLS AND DALES GENERAL)	
HOSPITAL,)	
)	
Petitioner)	Case No. 14-1082
)	
v.)	On Petition for Review of
)	360 NLRB No. 70
NATIONAL LABOR RELATIONS)	
BOARD,)	[NLRB Case No. 07-CA-053556]
)	
Respondent.)	

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MOTION TO EXTEND TIME FOR FILING BRIEFS

Petitioner, Hills and Dales General Hospital, by its attorneys Jackson Lewis P.C., hereby requests that the briefing schedule issued in this case be extended for seventy-five (75) days. In support of this motion, Hills and Dales states as follows:

1. The briefing schedule requires that Petitioner's Brief be filed on January 29, 2015, and Respondent's Brief be filed on March 15, 2015.

2. The parties have entered into a Settlement Agreement which has been fully executed. The Settlement Agreement requires Petitioner to post a notice for sixty (60) days. It also provides that after compliance the parties will jointly move for withdrawal of the petitions.

3. By extending the schedule for seventy-five (75) days, the parties will have ample time to fulfill the requirements of the Settlement Agreement, and thus will likely withdraw the petitions before any briefs are due.

4. The attorney for the National Labor Relations Board has indicated that the Board does not oppose this motion and, in fact, concurs with the relief requested.

WHEREFORE, Petitioner, Hills and Dales General Hospital, requests that the briefing schedule be extended for seventy-five (75) days.

JACKSON LEWIS P.C.
Attorneys for Petitioner

Dated: January 28, 2015

By: /s/ Timothy J. Ryan
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CERTIFICATE OF SERVICE

On this 28th day of January, 2015, the undersigned did cause to be filed the forging document with the Court using the CM/ECF system, which will send notice of its filing to all counsel of Record.

/s/ Timothy J. Ryan
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